


FILED

MAY 27 2022

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

UNITED STATES DISTRICT COURT

for the

Western District of Texas

Del Rio Division

DR 22 CV 0026

Case No. _____

(to be filled in by the Clerk's Office)

Lawrence Houston Hobbs

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The United States of America; and
The Honorable DEB HAALAND, in her official capacity as
The Secretary of the United States, Department of the Interior,
Bureau of Land Management

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Lawrence Houston Hobbs
Street Address	PO Box 1880
City and County	Canyon Lake/Comal County
State and Zip Code	Texas 78133
Telephone Number	830-313-3591
E-mail Address	LHHEEO@GMAIL.COM

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

Defendant No. 1

Name	THE UNITED STATES OF AMERICA
Job or Title <i>(if known)</i>	c/o United States Attorney General USDOJ
Street Address	950 Pennsylvania Avenue, NW
City and County	Washington, DC ; Washington County
State and Zip Code	Washington, DC 20530-0001
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	US Department of the Interior, Bureau of Land Management
Job or Title <i>(if known)</i>	c/o Honorable DEB HAALAND, Secretary
Street Address	1849 C Street, NW
City and County	Washington, DC ; Washington County
State and Zip Code	Washington, DC 20240
Telephone Number	(202) 208-4423
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is

Name	US Department of the Interior, Bureau of Land Management
Street Address	626 E. Wisconsin Ave #200
City and County	Milwaukee, Milwaukee County,
State and Zip Code	Wisconsin 53202
Telephone Number	(414) 297-4400

II. Basis for Jurisdiction

This action is brought for discrimination in employment pursuant to *(check all that apply)*:



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin). Note: EEOC OFO Appeal No. 2022000588 was filed by the Plaintiff on or about, November 14th, 2021, and over one hundred and eighty (180) days, have elapsed without the EEOC, rendering a final appeal decision. Therefore, this instant Complaint is properly submitted before this bar
(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.
Note: Plaintiff included age discrimination in his EEO Complaints
(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Other federal law (specify the federal law):

US Constitution(1st/4th/5th/6th/14th Amend);5 U.S.C. § 552a; Pub. L. 102-166; Pub. L. 111-2



Relevant state law (specify, if known):

Tex. Admin. Code, Title 40; Part 20; Ch. 819; Subchapter B; Rule §819.12



Relevant city or county law (specify, if known):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes *(check all that apply)*:

☒

Failure to hire me.

☐

Termination of my employment.

☐

Failure to promote me.

☐

Failure to accommodate my disability.

☒

Unequal terms and conditions of my employment.

☒

Retaliation.

☐

Other acts *(specify)*: Hostile Working Enviro, denial of training/financial entitlements

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

Sunday, March 4th, 2018 and continuously thereafter

C. I believe that defendant(s) *(check one)*:

☒

is/are still committing these acts against me.

☐

is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my *(check all that apply and explain)*:

☒

race

caucasian

☒

color

white

☒

gender/sex

male

☐

religion

☒

national origin

Northern European

☒

age *(year of birth)*

1964

(only when asserting a claim of age discrimination.)

☐

disability or perceived disability *(specify disability)*

E. The facts of my case are as follows. Attach additional pages if needed.

SEE
ATTACHMENT C-1
PLAINTIFFS COMPLAINANT OF
EMPLOYMENT DISCRIMINATION
MAY 27th, 2022

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

1st EEO Complaint was informally with EEO Counselor on April 18th, 2018 and multiple additional informal and formal EEO Complaints and EEO Complaint Amendments were filed there after.

- B. The Equal Employment Opportunity Commission *(check one)*:



has not issued a Notice of Right to Sue letter.



issued a Notice of Right to Sue letter, which I received on *(date)* .

Note: EEOC OFO Appeal No. 2022000588 was filed by the Plaintiff on or about, November 14th, 2021, and over one hundred and eighty (180) days, have elapsed without the EEOC, rendering a final appeal decision. Therefore, this instant Complaint is properly submitted before this bar

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:



60 days or more have elapsed.



less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See attachement.

Plaintiff Good Faith Settlement Offer of 05/27/22

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/27/2022

Signature of Plaintiff

 05/27/22
Lawrence H Hobbs "s/s" signed electronically

Printed Name of Plaintiff

Lawrence H Hobbs

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

CERTIFICATE OF SERVICE

Hobbs v Department of the Interior, Bureau of Land Management

05/27/22

DR 22 CV 0026

I, Lawrence Houston Hobbs, Plaintiff pro se, do here by certify that on the 27th Day of May, 2022, a true and correct copy of the foregoing pleading(s), namely, Notice of Filing a Civil Complaint, A copy of said Complaint, and a request for waiver of service, was forwarded to either the Defendant(s) proper and/or the attorney for Defendant(s), by either, Email, and/or U.S. Mail Delivery, Certified Mail, at the following address:

- 1) The Defendant identified herein as The United States of America, and the Defendant Federal Agency, identified herein as the Agency entitled: The United States, Department of the Interior, Bureau of Land Management. Service may be effectuated on the Defendant by serving the Honorable DEB HAALAND, in her official capacity as Secretary, US Department of the Interior, by hand delivery and/or certified mail, and to the legal representatives of the United States as "respondent superior" and to its subordinate agency, as identified herein below:

<u>Attorney General of the United States at Washington, D.C.</u> <u>(AG-US)</u>	<u>United States Attorney's Office</u> <u>(USA-W.D. Tex. DR)</u>	<u>Solicitor -U.S. Department of the Interior, Bureau of Land Management</u> <u>(SOL-DOI-BLM)</u>
Attorney General of the United States Attn: Notice of Summons Federal Employee and/or Federal Agency c/o Civil Process Clerk U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001	United States Attorney's Office W.D. Tex. DR Attn: Ashely C. Hoff, James Ward, c/o Civil Process Clerk 111 East Broadway, Room A306 Del Rio, Texas 78840 Phone: (830) 703-2025	c/o U.S. Department of the Interior, Office of the Solicitor, Immediate Office of the Solicitor, Attn: Robert Anderson, 1849 C Street, NW Washington, DC 20240, Phone: 202-208-4423
E-Mailed Notices: Mailed Notices: Published Notices: Process Server Contacted: Process Server Retained: Service Attempted: Service Completed:	Hand Delivered Notice: E-Mailed Notices: Mailed Notices: Published Notices: Process Server Contacted: Process Server Retained: Service Attempted: Service Completed:	Hand Delivered Notice: E-Mailed Notices: Mailed Notices: Published Notices: Process Server Contacted: Process Server Retained: Service Attempted: Service Completed:
Cc:	Cc: US Bureau of Land Management	

CERTIFICATE OF SERVICE*Hobbs v Department of the Interior, Bureau of Land Management**05/27/22*

US DOI Southwest Region Solicitors Office Attn: Frank Lupo Bldg 1, Suite 200 2400 Louisiana Blvd NE Albuquerque, NM 87110- 4303 (505) 248-5600	c/o Stephanie Carman 626 E Wisconsin Ave #200, Milwaukee, Milwaukee County, WI 53202 Email: scarman@blm.gov Phone: 414-297-4400 Fax: 414-297-4409	
Hand Delivered Notice: E-Mailed Notices: Mailed Notices: Published Notices: Process Server Contacted: Process Server Retained: Service Attempted: Service Completed:	Hand Delivered Notice: E-Mailed Notices: Mailed Notices: Published Notices: Process Server Contacted: Process Server Retained: Service Attempted: Service Completed:	

Dated: 05/27/2022



"s/s" Lawrence H Hobbs signed electronically

Signature of Plaintiff